



9091 County Road 50, Rockford, MN 55373
Local Area: 763-477-5854
Fax: 763-477-5863

May 8, 2018

**To: Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, California 95814**

Online Submission: https://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=ct-4-26-18-wkshp-ws&comm_period=1

I understand that an offset methodology adopted by the American Carbon Registry (ACR) has been recommended to be added to the list of approved methodologies for the creation of Air Resources Board Offset Credits. I recommend that ARB members consider and approve the methodology in their upcoming rulemaking proceedings.

The methodology is listed on the ACR site as “**Methodology for the Quantification, Monitoring, Reporting and Verification of Greenhouse Gas Emissions Reductions from the Transition to Advanced Formulation Blowing Agents in Foam Manufacturing Use, Version 2.0.**” This methodology would apply to several end-uses¹ where low-GWP blowing agents can be employed. Our company is interested in using this carbon offset credit methodology as an incentive to undertake such changes in our manufacturing process for extruded PS insulation. The benefits from credits arising from the use of low-GWP blowing agents in these end uses will have a direct environmental benefit on California.

Respectfully,

A handwritten signature in black ink that reads "Steve Slavik". The signature is fluid and cursive, with the first and last names being clearly legible.

Steve Slavik
Vice President of Operations
DiversiFoam Products

¹ Eligible End Uses under this methodology include two-component Rigid PU Spray Foam, XPS Boardstock, Rigid PUF Residential Refrigerators and Freezers, Rigid PUF Injected Foam for Retail Food Refrigeration, Industrial Refrigeration Systems, Refrigerated Transport, Heating, Air Conditioning and Air handling Systems and Marine flotation and buoyancy.